

To: Salera, Jerry@DOC[Jerry.Salera@conservation.ca.gov]
Cc: Kustic, Tim@DOC[Tim.Kustic@conservation.ca.gov]; Vermiel, Dan@DOC[Dan.Vermiel@conservation.ca.gov]; Albright, David[Albright.David@epa.gov]; Robin, George[Robin.George@epa.gov]
From: Dermer, Michele
Sent: Mon 12/23/2013 9:13:16 PM
Subject: RE: Aquifer Exemption info from DOGGR

Hi Jerry,

Is there something you would like to discuss about this submittal this week? I will be in on Thursday and Friday and also next Monday. Let me know if you want to schedule a call.

One question I have is that it is unclear to me how you intend to incorporate the exemptions. You've listed the wells that are involved, but I assume you are not going to request exemptions on a well by well basis, but rather a three dimensional addition to what you were calling the polygons?

Also, the table shows that there are a number of Class II wells in the Tulare formation in the Elk Hills field, but the table states the list does not include the Class I wells. That makes sense but as far as getting an exemption in the Tulare in the Elk Hills field, since there are 3 Class I wells in the Tulare and there are a number of Class II wells 1000 feet away, I would think your exemption request would cover the formation into which the Class I wells inject, since they are all in the same proximity.

Thanks, Michele

From: Salera, Jerry@DOC [mailto:Jerry.Salera@conservation.ca.gov]
Sent: Friday, December 20, 2013 5:22 PM
To: Albright, David; Dermer, Michele
Cc: Kustic, Tim@DOC; Vermiel, Dan@DOC
Subject: RE: Aquifer Exemption info from DOGGR

David and Michele,

Please find a preliminary set of data that is presented in table format (attached excel file) where I've identified the following:

1. Current AE applications and status of documentation top date
2. Category 1 - Injection into MOA Attachment 3 Fields/Formations and Known Injection into Non Primacy Formations/Zones
3. Category 2 - Injection outside of Shaded Areas in Primacy Data Sheets – D4 East-side fields. I've completed this D4 east-side fields table to complement the category 1 data which is really concentrated in that area.
4. Scoping of the Number of Class II Wells outside the Primacy productive areas (shaded) - preliminary

I believe we should prioritize our work on category 1 criteria and hence I included there a preliminary work schedule which I still have to finalize when we complete the 1st phase (meeting with concerned operators) targeted mid January 2014. Concurrent with the priority work on Cat 1, we will complete the work on Cat 2 and the scoping and meet with concerned operators as well. I'd like to explain and discuss this process as suggested by David with Michele below next week.

Jerry

From: Albright, David [<mailto:Albright.David@epa.gov>]
Sent: Friday, December 20, 2013 3:29 PM
To: Salera, Jerry@DOC; Dermer, Michele
Cc: Kustic, Tim@DOC; Vermiel, Dan@DOC
Subject: RE: Aquifer Exemption info from DOGGR

Thanks Jerry. I know we've scheduled the meeting on Jan. 8th, I just meant if there is something in particular that you needed to discuss with us, Michele will be around on the 23rd and 27th also. We'll look for your submittal later today.

Happy Holidays!

David

From: Salera, Jerry@DOC [<mailto:Jerry.Salera@conservation.ca.gov>]
Sent: Friday, December 20, 2013 3:17 PM
To: Albright, David; Dermer, Michele
Cc: Kustic, Tim@DOC; Wermiel, Dan@DOC
Subject: RE: Aquifer Exemption info from DOGGR

David,

I'm working on this right now and I'll send something out to Michele by COB today and can have informal discussions Monday, although we have scheduled to meet on January 8.

I can answer item 3 already: Yes, I can confirm that there are about 33 active Tulare wells, all WD in Elk Hills. I've told this to Michele already although did not have the count then.

For items 1 & 2, my plan initially concentrates on the most important category of wells which includes injection into MOA Attachment 3 fields and zones and known injections zones such as Elk Hills Tulare.

Thanks.

Jerry

From: Albright, David [<mailto:Albright.David@epa.gov>]
Sent: Friday, December 20, 2013 2:59 PM
To: Salera, Jerry@DOC
Cc: Dermer, Michele
Subject: FW: Aquifer Exemption info from DOGGR

Hi Jerry, I sent this to Tim but it looks like he is out until the New Year, so thought I should forward to you. Thanks.

From: Albright, David
Sent: Friday, December 20, 2013 2:50 PM
To: 'Kustic, Tim@DOC'
Cc: Dermer, Michele
Subject: Aquifer Exemption info from DOGGR

Hi Tim,

At our meeting last week, I believe you all agreed to provide us 3 things by today - 1) a list of fields with AE problems that will require fixing; 2) a preliminary draft of the plan for addressing the AE issues; and 3) a clarification of the situation with our Elk Hills permit – i.e., whether DOGGR will have to exempt the aquifer into which EH is injecting Class I fluids under the EPA permit (b/c there are Class II injectors using it as well).

Hopefully, that is still on track. I am on leave next week, but Michele will be in and available if Jerry or his team have any questions or would like to discuss these matters.

Thanks and Happy holidays!

David

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